

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

SAMUEL KERSON,)
Plaintiff,)
)
v.) No. 5:20-cv-00202-gwc
)
VERMONT LAW SCHOOL, INC.,)
Defendant.)
)
)

DECLARATION OF APRIL URBANOWSKI

I, April Urbanowski, do hereby state and declare:

1. I am a third-year student (“3L”) at Vermont Law School. I have personal knowledge of the facts and information contained in this Declaration.
2. I am currently doing a Semester in Practice with the Office of Administrative Hearings in Washington, D.C., and attending my VLS courses remotely.
3. I am a white student from Detroit, Michigan, but was living in Virginia when I applied to and was accepted by VLS. I had never seen the campus or visited South Royalton, Vermont before I arrived to start my law studies.
4. The first time I saw the Kerson mural that is the subject of this law suit, I was surprised and alarmed. At VLS, we pride ourselves on being an institution that is interested in issues of social justice and inclusion, we value conversations about diversity, and we work to promote diversity at VLS and in the larger community. The mural, with its cartoonish depiction of enslaved Africans seemed very inconsistent with the values VLS promotes.

5. During my time at VLS I have been an ally to the BIPOC (Black, Indigenous, Persons of Color) students. I've worked with another 3L, Jameson Davis, in particular on our objections to display of the Kerson mural.

6. I am also one of Dean Shirley Jefferson's student "Ambassadors," who serve to foster connections between students and the administration, as well as to promote VLS to the outside, through such functions as conducting tours and information sessions to potential students.

7. While I did not initially speak up about the mural when I was new to VLS, over time and as I learned of all the many functions that took place in the Chase Center, including career and social events—in fact, almost all big events on campus—I was more and more bothered by the mural. I realized, too, that BIPOC students avoided the study space in the Chase loft, and that the school took steps to avoid public display of the mural. As a student Ambassador, for example, I would never take prospective students or other people visiting the campus to Chase loft, and would avoid standing in the area of the Chase lounge on the first floor from which the mural is visible.

8. I had talked about the mural with Jameson Davis and other students who are offended by it, but had not approached the administration until last year, when we were 2Ls. The catalyst was the murder of George Floyd in Minnesota, which sparked a more active debate nationally and on campus about the realities of racism in this country.

9. I worked with Jameson Davis and other students to bring the issue of

the mural to a head with the administration. I joined Jameson as authors of the petition signed by more than a hundred other VLS students, alums, faculty and others that we presented to then-President and Dean Thomas McHenry asking for removal of the mural.

10. I know from my work and my friendships with BIPOC students how painful the mural is to them; it is offensive to me as well. Covering the mural with painter's drop cloths is not a satisfactory solution, as it is an obvious reminder that the mural hangs behind the curtain. While I would much prefer to have the mural removed, I understand VLS has decided to cover it with acoustical panels permanently affixed to the wall around the mural, so that there is no visible reminder of it in the loft, as a compromise solution.

I declare under the pains and penalties of perjury that these statements are true and correct.

Dated at ¹ District of Columbia, this 2nd day of February 2021.



[NAME]
April Urbanowski